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**R-009-207.25**

**U.S. EPA COMMENTS ON THE ADDENDUM TO  
THE SOUTH GROUNDWATER CONTAMINATION  
PLUME REMOVAL ACTION EE/CA**

**10/23/91**

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U.S. EPA COMMENTS ON THE ADDENDUM TO THE SOUTH GROUNDWATER CONTAMINATION PLUME  
REMOVAL ACTION EE/CA

1. General: The addendum should clearly present the locations of manholes 175, 177, and 177B. In addition, the EE/CA should clearly state that the uranium concentration from the South Plume and from the facility will be measured separately. This is required to establish that the "equivalent mass" concept is actually being achieved.
2. General: U.S. DOE should analyze the effect of the changes to the EE/CA on the requirements for public comment under the National Contingency Plan.
3. General: U.S. DOE should make sure that all changes to the document are consistent throughout the EE/CA.
4. Page 1, 3rd Paragraph: If uranium loading to the river is expected to decrease at a rate differently than indicated in the EE/CA (Page 5-16) the EE/CA must be modified to reflect the change.
5. Page 1, 4th Paragraph: There should be a discussion on the need for additional treatment of the contaminated groundwater, and why it was not included as part of this portion of the removal action.
6. Page 2, 2nd Paragraph: Should also indicate if any actual data has indicated the concentration of uranium above 30 ug/l.
7. Page 2, 2nd Paragraph: This paragraph should also describe the goal of Part 5, as to not only monitor portions of the contaminated groundwater plume not captured by the extraction wells, but to use the information to develop other activities that may result in the capturing of the remaining portions of the plume.
8. Page 2, 2nd Paragraph: Since U.S. EPA recently issued a proposed revised limit of 20 ug/l for uranium in drinking water, the change should be reflected in Section 5 of the EE/CA.
9. Page 2, 2nd Bullet: A discussion should be included regarding when and how the contaminant concerns will be addressed jointly between representatives of the Fernald Environmental Management Project and the Paddys Run Road Site companies.